

**COUNTY OF SUFFOLK**



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**DEPARTMENT OF LAW**

May 6, 2015

Hon. Steven I. Locke, U.S.M.J.  
United States District Court, Eastern District of New York  
Long Island Courthouse  
100 Federal Plaza  
Central Islip, NY 11722

Re: Franqui & Earl v. County of Suffolk  
CV13-5943(JS)(SIL)

Dear Judge Locke:

As the Court is surely aware, the Suffolk County Attorney's Office represents defendants in this civil rights action.

Defendants submit this letter in opposition to plaintiffs' motion for the identification of the officers depicted in the photographs of the officers present in the area of 6 Cordwood Path on January 13, 2013.(docket entry no. 52).

Plaintiffs already know who at least 5 of those officers are.

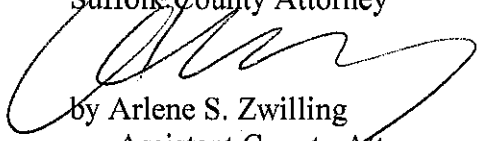
Plaintiffs deposed 4 of the officers who were present, to wit, officers Grenia, Lesciewicz, Rios and Robbins and thus are fully able to identify them. Furthermore (despite Ms. Fisch's statement to the contrary), we have produced the personnel files of these officers. Each of those files contains at least one photograph of the officer whose file it is, thus further identifying their likeness. Captain Crawford, another officer who at the scene, met plaintiffs' counsel when he appeared for a deposition (which plaintiffs then failed to take), and his appearance is therefore known to plaintiffs. It is anticipated that plaintiffs will take the depositions of, and demand production of the personnel files of, the additional officers and thereby obtain information connecting their appearance and names.

For these reasons, it would appear that any further identification would be superfluous. Nonetheless, in the spirit of cooperation, we will provide an identification of the remaining officers whom plaintiffs' counsel have not yet met and whose personnel files have not yet been provided. Indeed, we would have been amenable to providing this

information without the motion being made. However, plaintiffs' counsel was not open to such a compromise.

Respectfully yours,

Dennis M. Brown  
Suffolk County Attorney



by Arlene S. Zwillling  
Assistant County Attorney